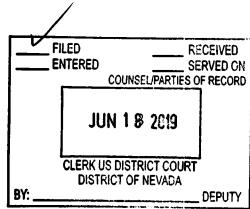
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1 SETH J. ADAMS, ESQ. Nevada Bar No. 11034 2 WOODBURN AND WEDGE 6100 Neil Road, Ste. 500 3 Reno, Nevada 89511 Telephone: 775-688-3000 Fax: 775-688-6088 5 sadams@woodburnandwedge.com BY: _ 6 Attorneys for Defendant Melissa L. Brown 7 8 9 10 FOR THE DISTRICT OF NEVADA 11 12 13 NICHOLAS T. SCHRAM, a Nevada resident, SANDRA L. SCHRAM, a Nevada resident 14 Plaintiffs. 15 VS. 16 MELISSA L. BROWN, a New York resident, 17 18 Defendant. 19 20 21 22 23 24 25 26 request for a short extension are as follows: 27 1.



IN THE UNITED STATES DISTRICT COURT

Case No. 3:18-CV-00055-CBC

STIPULATION TO EXTEND TIME TO FILE **DISPOSITIVE MOTIONS**

(First Request)

IT IS HEREBY STIPULATED by and between plaintiffs Nicholas and Sandra Schram, and defendant Melissa L. Brown, by and through their respective counsel, pursuant to LR IA 6-1, that the deadline to file dispositive motions in this case be extended from June 14, 2019 to Monday, July 1, 2019. The reasons for this mutual

On March 28, 2019, this Court approved a "Stipulation and Order to Extend Discovery Deadline" which extended the deadline for the parties to conduct

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discovery to May 17, 2019 as well as the deadline to file dispositive motions (to June 14, 2019). ECF No. 32.

- The Parties utilized the previously-granted extension to, amongst other 2. discovery, conduct depositions of the Plaintiffs, Mr. and Mrs. Schram (the Plaintiffs in this action, hereafter referred to collectively as the "Schrams"), as well as Melissa. The Schrams' depositions took place on May 15, 2019 and Melissa's deposition, which was conducted on May 3, 2019 in New York, N.Y. and simulcast to Reno, N.V. so that counsel for the Schrams and for Melissa did not have to travel to New York.
- Melissa's counsel is informed, based upon his recent discussion with 3. counsel for the Schrams, that the Schrams have just recently finished reviewing their deposition transcripts and have sent their Errata Sheets to the court reporter. Additionally, counsel for the Schrams will be providing a copy of the errata to counsel for Melissa next week.
- With regard to Melissa's deposition transcript, counsel for the Schrams 4. has indicated that he has just been provided a copy and will provide it to counsel for Melissa next week (with a copy of the errata referenced above). Melissa shall review her transcript as soon as she is provided it and provide a copy of any proposed revisions thereto in her errata, which shall be provided to the court reporter with a copy to counsel for the Schrams.
- In order to minimize the need to adjust any references to the 5. aforementioned deposition transcripts of the Schrams and Melissa so that they may be used in any dispositive motions brought by the Parties, a short extension is requested.
- 6. Undersigned Counsel believe that an extension to July 1, 2019 is sufficient to obtain finalized transcripts for the three (3) depositions referenced above and for the Parties to file any dispositive motions if they so choose.
- It is not believed that this extension, if granted, would substantively affect 7. any other deadlines in this case. The Parties' Joint Pre-Trial Order, per the abovereferenced Stipulation Extending Discovery Deadlines (ECF No. 32), is due either on

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1	July 19, 2019 or "30-days after decision on a dispositive motion." In the event neither	
2	party brings a dispositive motion on or before the requested July 1, 2019 deadline, the	
3	Parties would comply with the July 19, 2019 deadline for filing the Joint Pre-Trial Order.	
4	Should either or both Parties bring a dispositive motion on or before the requested	
5	extension, than the Parties would await ruling and file the Joint Pre-Trial Order within	
6	30-days as previously ordered.	
7	It is respectfully requested that the Court approve this request to extend the	
8	dispositive motion deadline to July 1, 2019.	
9	DATED: June 14, 2019	
10	FOR PLAINTIFFS:	FOR DEFENDANT:
11		
12	/s/ John S. Bartlett	/s/ Seth J. Adams
13	JOHN S. BARTLETT, ESQ. NV State Bar No. 143	SETH J. ADAMS, ESQ. NV State Bar No. 11034
14	775 N. Roop St., Ste. 108 Carson City, NV 89701	Woodburn and Wedge Reno, NV 89511
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16	joinisbardett@att.net	Sadams@woodbamanamsago.com
17	IT IS SO ORDERED.	
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19	DATED June 18, 2019	
20		$\bigcirc n$.
21		CARLARALDWIN CARRY
22		CARLA BALDWIN CARRY U.S. MAGISTRATE JUDGE
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